

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VILLAGE OF MINOOKA, an Illinois Municipal Corporation,

Plaintiff,

v.

WISCONSIN CENTRAL LTD.,

Defendant

Civ. No. 1:24-cv-5200
Hon. Matthew Kennelly

**DEFENDANT WISCONSIN CENTRAL LTD.’S
CROSS-MOTION FOR SUMMARY JUDGMENT**

Defendant Wisconsin Central Ltd. moves under Federal Rule of Civil Procedure 56 for summary judgment on Count I of Plaintiff Village of Minooka’s Amended Complaint and on Count I of Wisconsin Central’s Counterclaims.

Wisconsin Central is entitled to summary judgment—and Minooka is not—because the undisputed facts show that Minooka’s weight-limit ordinance is preempted by the ICC Termination Act (“ICCTA”). First, the ordinance is expressly or “categorically” preempted because, as applied to traffic related to the Chicago Logistics Hub (“CLH”), it effectively regulates the CLH’s intermodal operations. Second, the weight-limit ordinance is impliedly preempted because it unreasonably burdens the CLH’s intermodal operations. Third, the weight-limit ordinance is impliedly preempted because, in effect and purpose, it discriminates against the CLH. These reasons are explained fully in Wisconsin Central’s memorandum of law in support of this motion and in opposition to Minooka’s motion for summary judgment.

WHEREFORE, Wisconsin Central respectfully requests that the Court enter summary judgment for Wisconsin Central and against Minooka, holding that Ordinance 2024-19 is preempted

and unenforceable against traffic associated with the CLH, and grant any further relief that the Court deems just and proper in favor of Wisconsin Central.

September 26, 2025

Respectfully submitted,

/s/ Matthew J. Warren

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